

Application No. 09/344,826
Supplemental Amendment dated May 24, 2005

REMARKS

Claims 2, 10, and 18 have been amended. Claims 44-67 are withdrawn. Claims 2-43 are currently pending in the application.

This Supplemental Amendment is filed subsequent to the Amendment filed on April 29, 2005. The Amendment filed April 29, 2005 was submitted in response to the office action dated December 29, 2004. In the December office action, the Examiner rejected claims 2-3, 5, 7-11, 13, 15-19, 21, and 23-43 under 35 U.S.C. § 102(b) as being anticipated by Judice (USPN 3,937,878). The Examiner objected to claims 4, 6, 12, 14, 20, and 22. Applicant respectfully traverses the rejection and objection and requests reconsideration of the application.

Judice uses a single dither matrix with the same dither threshold values to halftone an image. Every pixel in the image is assigned a corresponding dither threshold value from the dither matrix, and that same dither threshold value is used when the pixel is first halftoned and during any subsequent "conditional replenishment" halftoning (see col. 2, line 60 to col. 3, line 2; col. 3, line 63 to col. 4, line 8; and col. 4, line 42 to col. 5, line 8)). "Conditional replenishment" halftones only those pixels that are different from the pixels in the preceding frame.

In order for a reference to anticipate an invention, each and every element of the claimed invention must be found in a single reference. Unlike Judice, Applicant's independent claims 1, 10, and 18 each recite, in relevant parts, "halftoning the input image by applying one of at least two halftone techniques *to the plurality of pixels in the input image*" and "repeating the step of halftoning the input image by applying one of at least two halftone techniques *to the plurality of pixels in the input image*." Judice teaches conditional replenishment, which halftones only those pixels that differ from the pixels in the preceding frame. Judice does not teach or suggest "repeating the step of halftoning the input image by

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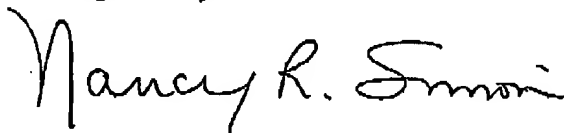
applying one of at least two halftone techniques to the plurality of pixels in the input image." Applicant therefore submits claims 1, 10, and 18 are not anticipated by Judice.

"Claims in dependent form shall be construed to incorporate by reference all the limitations of the claim incorporated by reference into the dependent claim." 37 CFR 1.75. Claims 3, 5, 7-9, and 26-31 depend from and include all the limitations of claims 2, claims 11, 13, 15-17, and 32-37 depend from and include all of the limitations of claim 10, and claims 19, 21, 23-25, and 38-42 depend from and include all of the limitations of claim 18. For at least the reasons discussed above, Judice does not anticipate independent claims 2, 10, and 18. Accordingly, dependent claims 3, 5, 7-9, 11, 13, 15-17, 19, 21, 23-43 are also not anticipated by Judice.

In light of the discussion above, Applicant believes that all claims currently remaining in the application are allowable and respectfully requests allowance of such claims.

Respectfully submitted,

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